DECLARATION OF GAYLA WILLIS

"My name is Gayla Willis. I am over 18 years of age, of sound mind and am competent to make this Declaration. The facts stated herein are within my personal knowledge and are true and correct.

I am Human Resources Manager for Weatherford U.S., L.P. In 2009, I oversaw and participated in layoffs in the MWD Operations Department, which included MWD Field Engineers.

In 2009, Weatherford experienced a substantial decline in business, which required reductions in the workforce, including MWD Field Engineers. In implementing these reductions, supervisors and managers ranked employees according to performance, skill level, potential for advancement, and disciplinary issues. Based upon these rankings, employees were selected for layoff. In April 2009, Robert Bowman was one of the employees selected for layoff. Military service or membership was not considered. There were three layoffs that impacted MWD Field Engineers—one in March 2009, one in April 2009, and one in May 2009.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed on April 21, 2011.

Sayla Willis
GAYLA WILLIS